

Superintendent's Office
1230 13th Street
906-863-9951

Blesch Intermediate School
1200 11th Avenue
906-863-4466



Menominee Junior-Senior High School
2101 18th Street
906-863-9929 / 906-863-7814

Central Elementary School
1800 18th Avenue
906-863-3605

**Request for Waiver
CC Docket No. 02-6
Menominee Area Public Schools
E-Rate BEN 131742**

December 30, 2015

Federal Communication Commission
445 12th St. SW
Washington, DC 20554

Via: apps.fcc.gov/ecfs/upload/display?z=xj9g5

Dear Sir or Madam:

Menominee Area Public Schools is requesting a waiver of the FCC Rule that requires Billed Entities under the E-Rate program to file a request for reimbursement within 120 days of the funding year end, or by no later than October 28, 2015 for funding year 2014-15. Due to the circumstances outlined below, Menominee Area Public Schools has suffered a hardship that has resulted in a possible loss of \$8,550 by missing the October deadline.

Our E-Rate application for 2014-15 was completed and finally approved on September 24, 2014. This application included funding requests for telephone and Internet services. One of those requests for Internet services was reimbursed through the Service Provider Invoice (SPI) and Menominee Area Public Schools received the approved credit of \$7,279.50 from the provider, Merit Network. However, because of an abrupt departure of the school employee directly responsible for requesting reimbursement under the Billed Entity Reimbursement Request (BEAR) process, information on the status of the 2014 E-Rate application was not passed on to any other personnel in the school district. Therefore, the district lost the \$8,550 referenced above. The spreadsheet lists the Funding Request Numbers and other pertinent information. This spreadsheet data was retrieved through the E-Rate Data Retrieval Tool.

| 471 App. # | Funding Request | SPIN | Service Provider | FCDL Date | Last Date to Request Reimbursement | Commitment Total | % Discount | Committed Discount |
|------------|-----------------|-----------|------------------|-----------|------------------------------------|------------------|------------|--------------------|
| 976835 | 2660717 | 143000677 | Verizon Wireless | 9/24/2014 | 10/28/2015 | \$4,920 | 75 | \$3,690 |
| 976835 | 2660581 | 143001727 | Michigan Bell | 9/24/2014 | 10/28/2015 | \$1,500 | 75 | \$1,125 |
| 976835 | 2660554 | 143003037 | Range Corp. | 9/24/2014 | 10/28/2015 | \$4,980 | 75 | \$3,735 |
| Total | | | | | | \$11,400 | | \$8,550 |

To compound the issue, a Form 470 application for 2015-16 was submitted within the proper filing window, but no action was taken beyond that time due to the same personnel problem mentioned above. This resulted in an additional loss of up to \$31,399.50, which we will have no chance of recovering at this late date.

The problems with missing E-rate activity for both 2014-15 and 2015-16 were not discovered until mid-November 2015, after the reimbursement filing window deadline for 2014-15 and well after the deadline for applying to E-Rate for 2015-16.

Additionally, during these periods, the district was experiencing turnover and vacancies in other administration and management positions, including the Superintendent and Business Manager. A declining student enrollment has also left the district with lower operating funds.

The loss of funds due to declining enrollment is especially important to the public interest, and to compound this issue with losing E-Rate funding will be a detriment to our students, staff, and community.

The district now has the personnel in place that will ensure that the request for E-Rate funding is filed in a timely and correct manner as part of a system of checks and balances and with a new process in place:

- The current superintendent is experienced and has been on board since July 1, 2014.
- The business manager is full-time and has an accounting degree. She was hired in January 2015. She has already implemented a number of processes and procedures in place that are aligned with sound business practices.
- The technology director has two masters' degrees (technology and educational leadership) and was hired in May 2015.
- The district has increased technology services to include a technician from part-time to full-time and an Informational Technology Consultant from Menominee County ISD. The increased staff has already made changes to how technology services are delivered; implemented a system for inventory and purchases that are cost effective, fiscally sound and meet the needs of the district's 21st Century learning goals.

Considering the above, Menominee Area Public Schools is requesting the FCC to waive the rule applying to reimbursement requests that fall outside the normal E-Rate filing window deadline. In this instance, our request is for E-Rate funding year 2014-15, allowing us to apply for up to \$8,550 in reimbursements.

For further information, please contact me at:

Menominee Area Public Schools
1230 13th Street
Menominee, MI 49858
Telephone: 906-863-9951
E-Mail: mileskit@gomaroons.org

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Terri Mileski". The signature is written in dark ink and is positioned above the printed name and title.

Terri Mileski
Superintendent

Cc: Kevin Karkkainen, Technology Director
Angela Anderla, Business Manager